

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>CITIGROUP GLOBAL MARKETS, INC.</b>	§	
<b>f/k/a SALOMON SMITH BARNEY, INC.</b>	§	
	§	
<b>Movant,</b>	§	
<b>v.</b>	§	<b>C.A. NO. 4:05-cv-03849</b>
	§	
<b>DEBRA M. BACON</b>	§	
	§	
<b>Respondent.</b>	§	

**MOTION TO WITHDRAW AS ATTORNEY OF RECORD  
FOR RESPONDENT DEBRA M. BACON**

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, Axelrod, Smith & Kirshbaum and Daniel R. Kirshbaum ("Counsel"), attorney for Respondent Debra M. Bacon ("Bacon"), and move this Court for an order allowing Counsel to withdraw as attorney of record for Bacon and in support thereof would respectfully show the Court as follows:

1. Counsel has determined that he can no longer adequately represent Bacon's interest in this cause, and therefore Counsel feels compelled to withdraw.
2. Bacon has advised Counsel that she no longer desires dual representation in this cause, and she has requested that her lead counsel, named below, solely represent her in this cause:

Braden W. Sparks  
Braden W. Sparks, PC  
8117 Preston Rd., Suite 800  
Dallas, TX 75225

All future communications to Bacon in this cause are to be directed to Mr. Sparks at the address set forth above.

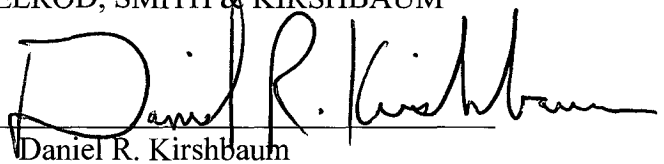
3. This Motion is not submitted as a tactic of delay, but only so that justice may be had for all parties. No harm or prejudice will result in Movant by the granting of this Motion.

WHEREFORE, PREMISES CONSIDERED, Axelrod Smith & Kirshbaum and Daniel R. Kirshbaum pray for an order allowing them to withdraw as attorney of record for Respondent Debra M. Bacon and releasing them from any further obligation to this Court or to Respondent Debra M. Bacon in this cause.

Respectfully submitted,

AXELROD, SMITH & KIRSHBAUM

BY:

A handwritten signature in black ink, appearing to read "Daniel R. Kirshbaum", is written over a horizontal line.

Daniel R. Kirshbaum

Bar No. 11533000

5300 Memorial, Suite 700

Houston, Texas 77007

(713) 861-1996

(713) 861-2622 (fax)

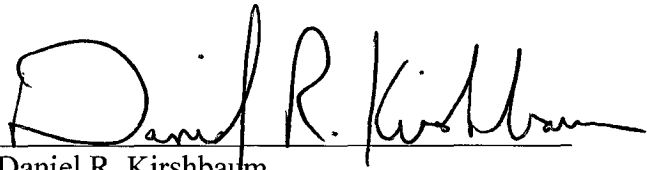
ATTORNEY FOR RESPONDENT  
DEBRA M. BACON

**CERTIFICATE OF SERVICE**

I hereby certify that on the 8th day of September, 2011, a true and correct copy of the foregoing has been served upon all parties and/or their counsel of record by fax and/or first class mail, as follows:

Andrew Harvin, Esq.  
Doyle, Restrepo, Harvin & Robbins, L.L.P.  
600 Travis, Suite 4700  
Houston, Texas 77002

Braden W. Sparks  
Braden W. Sparks, PC  
8117 Preston Rd., Suite 800  
Dallas, TX 75225



Daniel R. Kirshbaum

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